

Exhibit A

Declaration of Donyele Darrough

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

CONCERNED PASTORS FOR
SOCIAL ACTION, et al.,

Plaintiffs,

v.

NICK A. KHOURI, et al.,

Defendants.

Case No. 16-10277

Hon. David M. Lawson

DECLARATION OF DONYELE DARROUGH

I, Donyele Darrough, do hereby affirm and state:

1. I live in Flint, Michigan in a single-family home with my two sons. I bought my house at in spring 2022, when I moved to Flint from out of town.

2. In the summer of 2022, the City showed up at my home and dug up the service line in my front yard. I wanted the work to be complete to ensure that my drinking water was safe, especially because I already have new plumbing in my house. I am not sure whether the City found a lead service line and replaced it or not—no one from the City explained the work that they were doing to me.

3. The same day that the City dug the large hole in my yard to do the service line work, they refilled it with the same dirt they dug up. The City did not place any new top soil, grass seed, or sod on the dirt. They also did not level out the mound of dirt. As a result, my front lawn is damaged and looks worse than it did before the pipe work.

4. Since the day the City conducted the work at my home, no one from the City or its contractors has come back to restore my yard. For a year and a half, I have had a large dirt mound in my yard that wasn't there before the City dug up the service line. This mound is an eyesore. More than that, I am concerned that the damaged lawn will decrease my home's property value.

5. I have not received any contact from the City about whether it will return to fix my lawn. The individuals that did the work in summer 2022 did not say anything to me at the time about restoring my property.

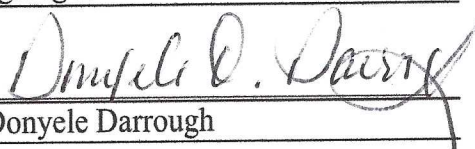
6. I considered trying to fix the lawn myself, but haven't done so yet, because it would require special tools to break up the dirt and level out the mound so that it's even with the rest of the yard. I want someone from the City to come back to repair my property.

7. I understand that the City may come to inspect my property in person to determine whether additional work is needed to repair my property. If the City inspects my property and decides that it will not be coming back to restore my property, I would like to be notified. If I received notice from the City, I could contact them to let them know that I want someone to come back to fix the dirt mound in my front yard and that the City has not yet restored my property. As of now, I am not sure who at the City to contact with concerns I have about

8. At a minimum, I believe the City should treat property owners with respect and consideration by communicating with them about whether it intends to conduct further work to restore properties after service line replacement work.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 19, 2023


Donyele Darrough